

CDA draft permit ammonia final limits; interim limits and compliance schedule

Draft Permit Ammonia Limits

Table 1 of the draft permit says that the FINAL limits (see below for summary) apply during the months of March, April, May June, July, August, September and October. There are no limits for November through February

The draft permit (page 9) states that the final effluent limits for ammonia do not have to be met for 9 years for the months of March, April, May, June and October.

So final limits must be met when the draft permit is issued as final for the months of July, August, September. Final limits for March, April, May, June and October have a compliance schedule of 9 years and no interim limits.

Summary of permit conditions

November through February –no limits

March, April, May and June –final limits in 9 years

July, August, September-meet final limits when permit is issued no compliance schedule

October-meet effluent limits in 9 years

So the draft permit has no internal conflicts about final limits and compliance schedules. However a problem arises when looking at the Fact Sheet and the 401 cert letter.

Draft Fact Sheet Ammonia Limits

In Table 3 of the FS the footnote says that CDA has 9 years to meet ammonia limits for the months of March, April, June and October.

This is consistent with the draft permit.

However in Table 4 EPA shows compliance schedule for ammonia

based on the Idaho DEQ certification will allow 9 years for compliance for March-May and October but NOT for June.

DEQ 401 Cert Compliance Schedule for CDA

Then look at the Idaho 401 cert letter dated January 17, 2007

1. The permittee must achieve compliance with the final effluent limitations for phosphorus, ammonia and CBOD set forth in Part I.B. (Table 1) of their permit not later than nine (9) years after the effective date of the final permit. Until compliance with the final effluent limits is achieved, the permittee must complete the following interim requirements and meet the following interim limits.
2. The interim limit for Total Ammonia (as N) for the first seven years of this nine year compliance schedule, for the period July 1 through September 30, will be 10mg/l for effluent flows under 4.2 mgd and 7.4mg/l for effluent flows greater than 4.2 mgd. During the compliance schedule, the lb/day limits set forth in Table 1 shall not apply. In addition, during the compliance schedule, there shall be no interim limit for Total Ammonia for the period October 1 through June 30.

For first 7 years July, August and September must meet interim limit of 10.mg/l for flows under 4.2 MGD and 7.4 mg.l for flows over 4.2 MGD. There are no interim lbs/day limits. After 7 years the final effluent limits apply during these months which means adding the lbs/day

October through June –no interim limits.